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BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

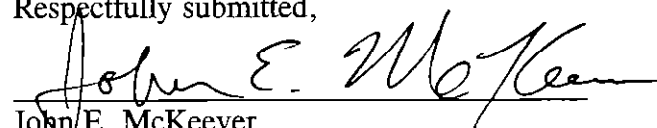
SPECIAL SERVICES REFORM, 1996

DOCKET NO. MC96-3

FIRST SET OF INTERROGATORIES OF  
UNITED PARCEL SERVICE TO UNITED STATES  
POSTAL SERVICE WITNESS W. ASHLEY LYONS  
(UPS/USPS-T1-1 - 2)  
(August 2, 1996)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, United  
Parcel Service hereby submits the attached interrogatories UPS/USPS-T1-1 - 2 to United  
States Postal Service witness W. Ashley Lyons.

Respectfully submitted,

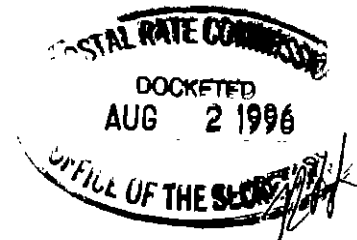
  
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Of Counsel.



UPS/USPS-T1-1. Please refer to page 18 of your testimony at lines 8-10.

(a) Please state the number of residences and businesses in the United States for which the Postal Service does not provide carrier delivery.

(b) Please state the total number of post office boxes for which the boxholders do not have the option of receiving carrier delivery.

(c) Please state the number of postal and contract facilities that provide no carrier delivery services for any residences or businesses in the area served by that postal or contract facility.

(d) Please state the number of postal and contract facilities that do not provide carrier delivery services for at least some of the residences or businesses in the area served by that postal or contract facility.

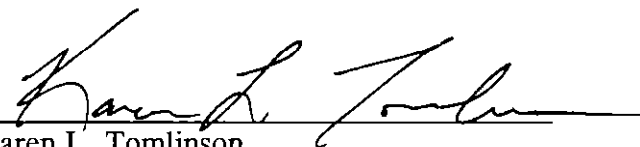
(e) Please state the number of individuals in the United States for whom carrier delivery at their residence is not currently provided.

UPS/USPS-T2-2. Please refer to page 18 of your testimony at lines 10-13.

Confirm that no carrier delivery for any class, subclass or category of mail is provided in the “relatively few offices” without carrier delivery or for the “boxholder[s] who [are] not eligible for carrier service.” If you cannot confirm, list each and every class, subclass or category of mail for which carrier delivery is provided for such offices and boxholders.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice and the Special Rules of Practice in this proceeding.

  
Karen L. Tomlinson  
Attorney for United Parcel Service

Dated: August 2, 1996  
Philadelphia, Pa.